



STATIONARY SOURCE COMPLIANCE

LARGE COATING TEAM

MEMORANDUM

DATE: February 24, 1998
TO: Team B Engineers
FROM: Alene Taber /s/ AT
SUBJECT: Rule 1401 Analysis for Coating Ovens

When evaluating an application for oven drying articles that are coated in a spray booth or other coating system, if the coating equipment has been previously permitted and everything going to the oven is processed by the permitted coating system, then no additional Rule 1401 analysis is required on the oven.

For example, if a spray booth was permitted with a condition prohibiting the use of Rule 1401 compounds, then no Rule 1401 analysis is required for the oven. Similarly, if the spray booth was not subject to Rule 1401, and the oven will only process articles that are coated in the spray booth, then the oven will not be subject to Rule 1401. In either of these cases, the following condition should be placed on the oven:

“Only articles coated in the spray booth (or specify coating equipment) under permit no. xxxxxx shall be processed in this equipment.”

If there are exempt coating operations or new coating equipment that you are permitting simultaneously that feed to the oven, then a Rule 1401 analysis is required for the oven.

AT: smke
cc: Carol Coy
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